UNITED STATES DISTRICT COURT DISTRICT COURT OF MINNESOTA

In Re: UnitedHealth Group Incorporated) Master File No. 06-1216 JMR/FLN
Shareholder Derivative Litigation)
)
) MOTION OF THE
) SPECIAL LITIGATION
) COMMITTEE IN
	SUPPORT OF ITS
	MOTION FOR
	PRELIMINARY APPROVAL
	AND DISMISSAL

TO: ALL PARTIES IN THE ABOVE NAMED ACTION AND THEIR ATTORNEYS OF RECORD.

The Special Litigation Committee of the Board of Directors of

UnitedHealth Group Incorporated hereby moves the Court for preliminary approval of its

disposition of the federal shareholder derivative claims asserted in the above-captioned
action and for dismissal of those claims.

Dated October 16, 2008

KELLY AND BERENS, P.A.

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